REMARKS

Claims 1, 8, and 14 have been amended. No new matter has been added.

Claims 1, 8, and 14 were amended to require that the address database facilitate translation of operating system independent commands received by a Fibre Channel wrapper module into Fibre Channel commands. The Fibre Channel commands are used by a Fibre Channel layer module that is in communication with a Fibre Channel controller.

In operation, an operating System Module (OSM), which is designed to execute on a particular operating system, translates an operating system dependent command into an operating system independent command usable by the Fibre Channel wrapper module. By dividing the Fibre Channel driver into an OSM and a FCHIM, which comprises a Fibre Channel wrapper module and a Fibre Channel layer module, the Fibre Channel driver of the present invention can be efficiently upgraded to match operating system changes without redesigning the entire driver. Moreover, because the FCHIM is generally capable of accepting operating system independent commands, embodiments of the present invention allow SCSI based network applications to operate over various Fibre Channel networks with little or no modification to the applications or the associated OSMs.

Claims 1-20 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,463,498 to Wakeley et al. (Wakeley). Applicants respectfully traverse. Independent claims 1, 8, and 14 all require constructing an address database having a device entry for a device. The device entry includes a port target identifier and a logical unit identifier for the device, and also associates device information with the port target identifier and the logical unit identifier. In addition, as mentioned above, claims 1, 8, and 14 have been amended to each require translating operating system independent commands into Fibre

Channel commands utilizing a Fibre Channel wrapper module and an address database having AL_PAs mapped to corresponding data ports and logical unit identifiers.

As illustrated in FIG. 3B of the present invention, an OSM 310 designed for a particular OS is utilized to translate received operating system dependent commands into operating system independent commands. Once the received commands are translated into operating system independent commands, the operating system independent commands are provided to a Fibre Channel wrapper layer 324. The Fibre Channel wrapper layer 324 receives the operating system independent command and translates the command into a Fibre Channel command using the address database to map the SCSI based command into a Fibre Channel command for the target device. Once translated, the new Fibre Channel command is provided to a Fibre Channel layer module, which provides the command to the Fibre Channel controller for transmission through the network.
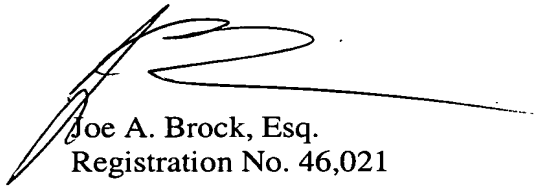
In contrast, Wakeley does not disclose or reasonable suggest translating operating system <u>independent</u> commands into Fibre Channel commands. By translating operating system specific commands into operating system independent commands, the Fibre Channel specific portions of the Fibre Channel driver can be unaltered when the OSM portion is modified to operate on a different operating system. As a result, the Fibre Channel driver can be efficiently upgraded to match operating system changes without redesigning the entire driver. Moreover, because the Fibre Channel wrapper module generally is capable of accepting operating system independent commands, embodiments of the present invention allow SCSI based network applications to operate over various Fibre Channel networks with little or no modification to the applications or the associated OSMs.

Accordingly, independent claims 1, 8, and 14, as amended, are submitted to be patentable under 35 U.S.C. § 102(e) over the Wakeley patent. Claims 2-7, 9-13, and 15-20,

each of which ultimately depends from independent claims 1, 8, and 14 respectively, are likewise submitted to be patentable under 35 U.S.C. § 102(e) over Wakeley for at least the same reasons set forth above regarding claims 1, 8, and 14.

In view of these remarks and the above amendments, allowance of this application is believed to be in order, which action is respectfully requested. If any discussion of this application is initiated by the Examiner, please direct a call to Joe A. Brock, Esq., 408-749-6900 x6920.

Respectfully submitted,

MARTINE & PENILLA, LLP

Joe A. Brock, Esq.
Registration No. 46,021

MARTINE PENILLA & KIM, LLP
710 Lakeway Drive, Suite 170
Sunnyvale, CA 94086
Telephone: (408) 749-6900
Facsimile: (408) 749-6901